

TITLE ONE NEWS



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Important dates and deadlines

Supplement not supplant methodology documentation is due Dec. 10. This documentation should be kept on file at the district. Additional information on the methodology is provided in the newsletter.

On the web

- [October new coordinator cadre webinar](#) and [accompanying PowerPoint](#)
- [Title I, Part A Handbook](#) – Page 9 (Comprehensive Schoolwide Plan) has been updated to include the coordination and integration with other programs (see ESSA 1114(b)(5)) when developing a schoolwide program.

Methodology: Demonstrating supplement, not supplant compliance under ESSA

Supplement, not supplant (SNS) is one of the three fiscal tests in Title I, Part A. The purpose is to ensure that Title I funds *add to* (supplement) and do not *replace* (supplant) state and local funds. Title I funds should not be used to provide services that would be supported with state or local funds in the absence of Title I dollars.

The SNS rule itself did not change under ESSA; the change was made regarding how a local educational agency (LEA) must demonstrate compliance with the rule. According to ESSA 1118(b), “a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving Title I funds.” The supplanting requirement is satisfied if the LEA can demonstrate that state and local funds are not being replaced with federal funds.

The methodology refers to the way an LEA distributes state and local funds to schools. Schools must be funded in a neutral manner, meaning the LEA does not base how to distribute state and local funds based on the Title I funds a school will receive. This means the focus has shifted from analyzing individual Title I costs and services to an analysis of how the LEA distributes state and local funds to schools. It is important to note that Title I spending must still meet other requirements such as school eligibility, student eligibility, consistency with the purpose of Title I, and federal cost principles. Materials and services funded by Title I must still be reasonable, allocable, necessary, and documented.

Possible methods of allocation are positions in the school (student/teacher ratio), a weighted student funding formula, or a combination of approaches. The tentative allocation of funds required by [702 KAR 3:246](#) and staffing allocation required by [KRS 157.360](#) combined with accompanying narratives could provide supporting documentation that the SNS requirement has been satisfied.

The LEA must document the methodology for distributing state and local funds in order to demonstrate compliance. The deadline for this documentation is Dec. 10. Documentation of methodology will be one of the items examined by the Kentucky Department of Education (KDE) during a monitoring visit or desk audit. ESSA 1118(b)(4) states that

the federal government is not permitted to dictate the specific methodology used by an LEA to allocate state and local funds to each school.

More information on the SNS revision can be found in the [October new coordinator cadre webinar](#) and [accompanying PowerPoint](#) on the Title I, Part A Resources webpage. Page 6 of the [Title I Handbook](#) has been updated to include information about supplement not supplant methodology.

New coordinator cadre

This month's webinar will take place from 10-11 a.m. ET Nov. 15 and will include information on the Title I coordinator's year-at-a-glance calendar as well as other important topics. Title I coordinators with three years or less of experience interested in participating should email title1reports@education.ky.gov for more information.

Family engagement tip: Get dads involved

Increasing the participation of fathers and father figures (stepfathers, uncles, grandfathers, older brothers, et cetera) can sometimes require a more tailored approach than a school or district may be accustomed to. [Watch DOGS](#), or Dads of Great Students, is a great resource for both fathers and schools seeking to get more dads involved. According to Watch DOGS, a program of the [National Center for Fathering](#), providing direct invitations to fathers to participate in structured activities at school can have great results.

Kentucky has approximately [190 schools participating in the Watch DOGS program](#). The program costs \$450 per school and can be funded through Title I, Part A. More information, articles, and other resources can be found at [National Center for Fathering](#). Be sure to check out how a central Kentucky school is using the Watch DOGS program in an upcoming issue!

Check and update Person Role Manager – Title I coordinator

Districts should check and update, if necessary, the name of the Title I coordinator in Person Role Manager to ensure the correct person receives communication from KDE in a timely manner. To check the Title I coordinator for your district, follow these instructions:

- Verify district Title I coordinator by selecting district on the [Open House](#) website.
- If the Title I Coordinator role is blank or incorrect, the update must be made in Person Role Manager via [KDE Web Applications](#).
- For Title I coordinators who are listed but no longer should be, their *role status* must be changed to "inactive" and a *role end date* entered via [KDE Web Applications](#) | Person Role Manager.
- To add a Title I coordinator, the *role status* must be set to "active" and a *role start date* entered. Also ensure an email address is entered on the demographic screen. This should be done via [KDE Web Applications](#) | Person Role Manager as well.

For questions or concerns, please email [Windy Newton](#).

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